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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

APP-ORDER LLC, a Nevada limited liability
company DBA Zorts Sports;

Plaintiff,

vs.

HAROLD REYNOLDS, an individual,

Defendant.

Case No.: 2:24-cv-01480-GMN-DJA

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE
(1) RESPONSE TO COMPLAINT,
AND (2) RESPONSE TO MOTION TO
COMPEL ARBITRATION
[ECF NOS. 1, 4]**

[FIRST REQUEST]

Pursuant to Local Rules IA 6-1 and 7-1, Plaintiff APP-ORDER LLC dba Zorts Sports (“Plaintiff”), by and through its counsel of record, McDonald Carano LLP, and Defendant Harold Reynolds (“Defendant”), by and through his counsel of record, Kemp Jones, LLP and Cline Williams Wright Johnson & Oldfather, L.L.P. (*pro hac forthcoming*), hereby stipulate, agree, and respectfully request that the Court extend the deadline for Defendant to file his (1) Response to Plaintiff’s Complaint (ECF No. 1), and (2) Response to Motion to Compel Arbitration (ECF No. 4) from October 14, 2024, to October 30, 2024.

1 1. On August 12, 2024, Plaintiff filed its Complaint. ECF No. 1.

2 2. On August 13, 2024, Plaintiff filed its Motion to Compel Arbitration with an
3 Appendix. ECF Nos. 4 and 5 (the "Motion").

4 3. Plaintiff provided courtesy copies of the Complaint and the Motion to Defendant's
5 pro hac lead counsel on August 14, 2024.

6 4. At Defendant's request, the parties initially agreed that Defendant would have
7 until October 14, 2024, to obtain local counsel and to respond to the Complaint and Motion.

8 5. Defendant is currently in the process of formally engaging Kemp Jones, LLP as
9 local counsel in this matter. Once engaged, Kemp Jones, LLP needs sufficient time to review and
10 respond to the Complaint and Motion. Despite the parties' initial agreement stated in ¶ 4 herein,
11 this is the first request made by the parties to extend these deadlines.

12 6. Therefore, the parties respectfully request that Defendant's deadline to respond to
13 the Complaint and Motion be extended from October 14, 2024, to October 30, 2024.

14 DATED this 11th day of October, 2024.

DATED this 11th day of October, 2024.

15 By: /s/ Mona Kaveh

By: /s/ Rory Kay

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24 *Attorneys for Defendant*

25 **IT IS SO ORDERED:**

26 

27 DANIEL J. ALBREGTS
28 UNITED STATES MAGISTRATE JUDGE
DATED: 10/17/2024